


ZMO LAW PLLC

July 9, 2021

Via ECF

Hon. Vernon S. Broderick
Southern District of New York
Thurgood Marshall US Courthouse
40 Foley Square
New York, NY 10007

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 7/12/2021

RE: *U.S. v. Janae Bendolph*, 16 Cr. 851

Dear Judge Broderick:

This office represents Janae Bendolph in the above-captioned matter. On June 30, 2021, the Court ordered the parties to confer and to submit a proposed modification to Ms. Bendolph's release conditions by July 9, 2021.

The parties propose Ms. Bendolph's release conditions be modified to permit her to travel for purposes of employment without the approval of the Court, probation, or the government.

The parties believe that this modification will allow Ms. Bendolph to more easily pursue employment opportunities, especially those that require frequent travel with short notice. Ms. Bendolph understands that she will still be required to keep probation informed of any travel plans, even when she no longer needs prior approval for that travel.

Thank you for your attention to this request.

Very truly yours,

ZMO Law PLLC

Victoria Nicole Medley

Victoria Nicole Medley

CC: AUSA Michael McGinnis (via ECF)